

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
(at Boston)**

**IN RE: NEW ENGLAND
COMPOUNDING PHARMACY,
INC. PRODUCTS LIABILITY
LITIGATION**

) **Master File No. 1:13-MD-2419-FDS**
) **MDL Docket No. 2419**
) **This Document Relates To:**
) ***Shaffer v. Cadden, 1:13-cv-10226-FDS***
) ***Schroder v. New England Compounding***
) ***Pharmacy, Inc., 1:13-cv-10227-FDS***
) ***Adams v. Cadden, et al., 1:13-cv-10229-FDS***

DECLARATION OF JOSEPH P. THOMAS

I, Joseph P. Thomas, hereby submit this Declaration to the Court pursuant to Local Rule 83.5.3 in support of the Motion to Admit *Pro Hac Vice* and as part of my application for leave to practice in this Court and to appear and participate in the action on behalf of defendant GDC Properties Management, LLC (“GDC”), by whom I have been retained, and state:

1. I am a member in good standing of the Bars of the States of Ohio, Kentucky, and New Jersey; the Bars of the United States District Courts for the Northern District of Florida, Northern District of Illinois, Southern District of Indiana, Eastern District of Kentucky, Western District of Kentucky, Eastern District of Michigan, District of New Jersey, Southern District of New York, Western District of New York, District of North Dakota, Northern District of Ohio, Southern District of Ohio, Eastern District of Texas, Northern District of Texas, and Southern District of Texas; the Bars of the United States Circuit Courts of Appeals for the First Circuit, Second Circuit, Third Circuit, Fourth Circuit, Fifth Circuit, Sixth Circuit, Eighth Circuit, Ninth Circuit, and Tenth Circuit; the United States Patent and Trademark Office; and the United States Supreme Court.

2. I am a partner with the firm of Ulmer & Berne LLP, (513) 698-5000 (main), (513) 698-5004 (direct).

3. I have been requested by GDC to act as national counsel for GDC in cases pending in this multidistrict litigation and related cases.

4. I have never been subject to any disciplinary action, and no disciplinary actions are pending against me as a member of any bar to which I am admitted.

5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

I declare under the penalty of perjury that the foregoing is true and correct.

/s/ Joseph P. Thomas
Joseph P. Thomas